NOTICE OF LODGING OF PROPOSED STIPULATED PROTECTIVE ORDER

Filed 06/27/25

#:876

Page 1 of 3 Page ID

PAGE 1

Case 2:24-cv-07453-CV-AJR Document 65

a

1

3

456

8 9

1011

12

13 14

15

16

17 18

19

2021

22

2324

25

26

27

Plaintiff PCR Distributing Co. ("Plaintiff") and Defendant X Separator LLC ("Defendant") file this Notice of Lodging of Proposed Stipulated Protective Order and in support of said Notice would respectfully show the Court the following:

Pursuant to L.R. 5-4.1 *et seq.*, the parties have agreed to the Proposed Stipulated Protective Order attached hereto as **Exhibit 1** and hereby submit the Order for review and approval by the Court. A redline comparison is also being submitted contemporaneously herewith via electronic mail to Magistrate Richlin's chambers that shows all differences between the submitted order and the Court's model order.

**DATED**: June 27, 2025

By: <u>/s/Eric Bjorgum</u> Eric Bjorgum

(State Bar No. 198392)

Èric.bjorgum@bjorgumlaw.com

**BJORGUM LAW** 

119 E. Union Street, Suite C Pasadena, CA 91103

Telephone: (213) 596-6390

Facsimile: (213) 596-6399

ATTORNEYS FOR PLAINTIFF PCR DISTRIBUTING, CO.

Respectfully submitted,

By: /s/ Jennifer M. Rynell

John T. Wilson (Pro Hac Vice)

Texas Bar No. 24008284

Jennifer M. Rynell\*

Texas Bar No. 24033025

eservice@wwrlegal.com

WILSON WHITAKER RYNELL

Wilson Legal Group P.C.

16610 Dallas Parkway, Suite 1000

Dallas, Texas 75248

(T) 972-248-8080

(F) 972-248-8088

\*Pro Hac Vice

Glenn T. Litwak (State Bar No. 91510) glenn@glennlitwak.com

LAW OFFICES OF GLENN T. LITWAK

201 Santa Monica Boulevard, Suite 300

Santa Monica, California 90401

(T): 323-518-2826 (F): 310-207-4180

ATTORNEYS FOR DEFENDANT

X SEPARATOR LLC

1

2

45

6

7

8

9

10

11

12

13 14

15

16

17

18

1920

21

22

2324

25

26

27

**PROOF OF SERVICE** 

On June 27, 2025, I served the foregoing document – **NOTICE OF LODGING OF PROPOSED STIPULATED PROTECTIVE ORDER** - on all counsel of record by a manner authorized by Federal Rule of Civil Procedure 5(b)(2) and the Local Rules. The method of service employed was via electronic mail by agreement of the parties:

Eric Bjorgum (State Bar No. 198392)

Eric.bjorgum@bjorgumlaw.com

Martin H. Pritikin (State Bar No. 210845)

marty@procel-law.com

BJORGUM LAW, PC 119 E. Union Street, Suite C

Pasadena, CA 91103

Telephone: (213) 596-6390 Facsimile: (213) 596-6399

Attorney for Plaintiff PCR Distributing, Co.

/s/ Jennifer M. Rynell
Jennifer M. Rynell